

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

BID PROTEST

_____)	
BLUE ORIGIN FEDERATION, LLC,)	
)	
<i>Plaintiff,</i>)	
)	Case No. <u>21-1695 C</u>
v.)	
)	
UNITED STATES OF AMERICA,)	
)	
<i>Defendant.</i>)	
_____)	

PLAINTIFF'S MOTION FOR A PROTECTIVE ORDER

Pursuant to Paragraph 17 of Appendix C of the Rules of the United States Court of Federal Claims (RCFC), Plaintiff Blue Origin Federation, LLC (Blue Origin), respectfully moves for a Protective Order in this matter consistent with the United States Court of Federal Claims Form 8, *Protective Order in Procurement Protest Cases*. A Protective Order is necessary to comply with the Protective Order issued by the U.S. Government Accountability Office (GAO) governing use of protected material from Blue Origin's bid protest there (GAO File No. B-419783; B-419783.3), and to protect confidential, proprietary, and source selection information contained in the Complaint, and other filings and hearing transcripts in this bid protest. The GAO's Protective Order contemplates the entry of a similar protective order by the Court to protect protected material furnished in Blue Origin's GAO bid protest.

The Complaint and related filings contain source selection sensitive information, as well as offerors' proprietary information, trade secrets, and confidential financial information, the public release of which would potentially cause offerors severe competitive harm. The administrative record in this bid protest likely will contain similarly sensitive information. Accordingly, Blue Origin respectfully requests the Court GRANT this Motion.

Dated: August 13, 2021

Respectfully submitted;



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